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Attorneys for Plaintiffs Michael Larkin and Inka Larkin,

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

In re) Case No. 11-50240
ROBERT EDWARD HAYNER and JANE) Chapter 7
E. HAYNER,) Adv. Pro. No.:
Debtors.)
) JOINT CASE MANAGEMENT
) CONFERENCE STATEMENT
MICHAEL LARKIN, an individual, and)
INKA LARKING, an individual;)
Plaintiffs,)
v.)
ROBERT EDWARD HAYNER, an) Date: August 9, 2011
individual; and JANE E. HAYNER, an) Time: 2:00 p.m.
individual,) Judge: Hon. Charles Novack
Defendants.) Telephonic

Plaintiffs Michael Larkin and Inka Larkin ("Plaintiffs") and Defendants Robert Edward Hayner and Jane E. Hayner ("Defendants") respectfully submit this Joint Case Management Conference Statement.

1. Date and Time that Counsel Conferred:

Counsel conferred on July 19, 2011 at approximately 9:00 a.m.

2. Summary of Legal Theories and Facts

1 ground that Defendants have fraudulently transferred and concealed from the bankruptcy court
2 the millions of dollars in sales proceeds derived from the sale of CATI.

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4 **b) Defendants' Statement**

5 Defendants deny the material allegations contained in the complaint.

6 **3. Proposed Discovery Plan**

- 7 a) Initial Disclosures: August 23, 2011
8 b) Expert Testimony Disclosure: Sometime March 2012
9 c) Discovery Cut Off Date: Sometime April 2012
10 d) Pretrial Motion Filing Cut Off Date: Sometime May 2012.

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12 **4. Estimated Time for Trial and Desired Date:**


13 2-3 days. Sometime July 2012.

14 **5. Alternative Dispute Resolution**

15 The parties are amenable to alternative dispute resolution.


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17 Dated: Aug 2, 2011

JOHNSON & MONCRIEF, PLC

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21 Dennis Lewis, Esq.
22 Attorneys for Plaintiff Michael Larkin and
Inka Larkin

23 Dated: July 26, 2011

DUFFY & GUENTHER, LLP

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26 Ralph P. Guenther, Esq.
27 Attorneys for Defendants Robert Hayner
and Jane Hayner